UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EASYTEX CORPORATION LIMITED,

Plaintiff

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-against-

PETER & FRANK OF NY, CORP., CHUL KYU KIM a/k/a KIM CHUL KYU a/k/a CHUK CHUL KIM a/k/a ROBERT CHUL KIM a/k/a CHUL KYOO KIM a/k/a CHULKYOO KIM a/k/a KIM K. CHUL, BARO SHIPPING CO., LTD., TOP TEN TRANS, INC., GFA, INC., 3 WIN INC., MERCURY, AMERICAN INTERNATIONAL LINE, INC., SOON CHAN HONG a/k/a SOON C. HONG a/k/a SOONCHAN C. HONG a/k/a SOON CHANGE HONG a/k/a CHAN S. HONG a/k/a HONG S. CHAN a/k/a HONG SOON CHANG d/b/a SOONCHAN HONG CUSTOM HOUSE BROKER, STOP & STOR, jointly and severally,

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Index No. 07-CV-03907 (BSJ)

ANSWER TO CROSS-CLAIMS OF DEFENDANT AMERICAN INTERNATIONAL LINE, INC. (d/b/a Mercury)

Defendants	

Defendant, STOP & STOR, by and through its attorneys, the Law Offices of Harvey and Vandamme, as and for an answer to the cross-claims of the co-defendant American International Line, Inc. (d/b/a Mercury), alleges as follows upon information and belief:

- 1. DENIES each of the allegations in ¶ 181 of the Complaint for First Cross-Claim against Co-Defendant Stop & Stor– for Apportionment.
- 2. DENIES each of the allegation in ¶ 182 of the Complaint for Second Cross-Claim against Co-Defendant Stop & Stor – for Indemnification

WHEREFORE, Stop & Stor respectfully requests that the claims and actions against it be dismissed in their entirety, with cost and attorneys' fees.

Jury Demand

Stop & Stor hereby demands a trial by jury of all issues properly triable to a jury pursuant to Rule 38 (b) of the Federal Rules of Civil Procedure.

Dated: New York, New York July 28, 2008

> Hendrick Vandamme (HV – 7702) Law Offices of Harvey & Vandamme Attorneys for Defendant STOP & STOR 90 Broad Street, Suite 2202 New York, NY 10004 (646) 428-2650

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing:

ANSWER TO CROSS-CLAIMS OF DEFENDANT AMERICAN INTERNATIONAL LINE, INC. (d/b/a Mercury)

was served on the attorney for Plaintiff and Co-Defendants by causing the same to be delivered by first class mail, postage prepaid to:

TO: THE PARK LAW GROUP, LLC EASYTEX CORPORATION LIMITED 23 S. Warren Street - 2nd Floor Trenton, New Jersey 08608 (609) 396-2800

> COZEN O'CONNER 45 Broadway Atrium – Suite 1600 New York, NY 10006 RODRIGUEZ O'DONNEL GONZALEZ & WILLIAMS, P.C. 1211 Connecticut Avenue, N.W. - Suite 800 Washington DC 20036

JEFFREY S. STEPHENS, P.C. 14 Duncan Drive Greenwich, CT 06831

CARL E. PERSON, ESQ. 325 W. 45th Street - Suite 201 New York, New York 10036

An electronic was copy also was forwarded via email to the above counsel at:

cpark@theparklawgroup.com; hchoi@theparklawgroup.com; dloh@cozen.com; Gonzalez@rofgw.com; and jss50@mail.com

Dated: New York, New York July 28, 2008

Hendrick Vandamme (HV – 7702)

3